

REMARKS

The Office Action dated June 14, 2004 contained a final rejection of claims 1-13, 15-29 and 32-37. The Applicants have amended claims 1, 2, 15, 16, 19, 32 and 33. Claims 1-13, 15-29 and 32-37 remain in the case. Please consider the present amendment with the attached Request for Continued Examination (RCE) under 37 C.F.R. § 1.114. This amendment is in accordance with 37 C.F.R. § 1.114. Reexamination and reconsideration of the application, as amended, are requested.

Claims 1-6, 10, 11, 13, 15, 16, 19 and 32 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Donohue et al. (U.S. Patent No. 5,987,480). Also, claims 7, 12, 17, 18, 24, 25, 33 and 34 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Donohue et al. In addition, claims 8, 20-22, 26, 27, 29, 35 and 36 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Donohue et al. in view of Rapaport et al. (U.S. Patent No. 5,890,152). Last, claims 9, 23, 28 and 37 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Donohue et al. in view of Rapaport et al. (U.S. Patent No. 5,890,152), and further in view of Griebenow et al. (U.S. Patent No. 5,850,520).

The Applicant respectfully traverses these rejections based on the amendments to the claims and the arguments below.

With regard to the rejections under U.S.C. 102, the Applicants respectfully submit that Donohue et al. reference does not disclose all of the claimed features independent claims 1, 15 and 32. For example, although Donohue et al. disclose a system and method "...for delivering documents having dynamic content embedded over the worldwide Internet or a local internet or intranet...", Donohue et al. is missing elements of the Applicants' amended claims.

Namely, **unlike** Donohue et al., the Applicants' claim 1 recites in part "...a layout manager configured to maintain a record of time required to complete at least a partial layout of the publication for estimating a time required to layout and complete future publications containing one or more of the same content objects." Next, claim 15 recites in part "...managing contractual obligations of users and content providers of the document delivery system including maintaining royalty information and display agreements of selected content providers, advertising rates for other content providers and subscription information for selected users." Last, claim 32 recites in part "...a knowledge module having a database driven component configured to receive information from printers of the requesting users for dynamically and automatically receiving printing habits of users that includes at least one of total ink usage or usage broken out by ink color and printable media usage that includes a

Serial No.: 09/523,283
Attorney Docket No.: 10001063-1

number of pages printed and type of media used for dynamically and automatically updating the user profiles." Clearly, Donohue et al. do **not** contain these claimed features.

Hence, since the cited reference does not disclose all of the elements of the Applicants' claimed invention, the reference cannot anticipate the claims. As such, the Applicants' respectfully submit that the rejections under 35 U.S.C. 102 should be withdrawn.

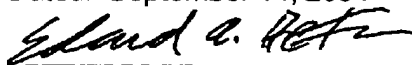
With regard to the rejections under U.S.C. 103(a) of the dependent claims, the Applicants respectfully submit that the combined cited references do **not** disclose, teach, or suggest all of the features of the newly amended claims. For example, none of the cited references, in combination or alone, contain the layout manager of claim 1, the managing contractual obligations of users of claim 15 and the knowledge module of claim 32. Accordingly, the combined cited references cannot render the Applicants' invention obvious. This failure of the cited references to disclose, suggest or provide motivation for the Applicant's claimed invention indicates a lack of a prima facie case of obviousness (MPEP 2143).

With regard to the dependent claims, because they depend from the above-argued respective independent claims, and they contain additional limitations that are patentably distinguishable over the cited references, these claims are also considered to be patentable (MPEP § 2143.03).

Thus, it is respectfully requested that all of the claims be allowed based on the amendments and arguments. Accordingly, the Examiner is respectfully requested to withdraw the outstanding rejection of the claims and to pass this application to issue. Additionally, in an effort to further the prosecution of the subject application, the Applicant kindly requests the Examiner to telephone the Applicants' attorney at (818) 885-1575. Please note that all mail correspondence should continue to be directed to

Hewlett Packard Company
Intellectual Property Administration
P.O. Box 272400
Fort Collins, CO 80527-2400

Respectfully submitted,
Dated: September 14, 2004



Edmond A. DeFrank
Reg. No. 37,814
Attorney for Applicants
(818) 885-1575 TEL
(818) 885-5750 FAX